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Sent: Friday, March 11, 2022 11:32 AM
To: DES SBCC <sbcc@des.wa.gov>
Subject: 2021 Washington State Energy Code - Draft - Comments

External Email

To whom it may concern,

I am a building industry professional employed by an MEP consulting firm who works daily with the energy code and energy modeling. I have reviewed the draft 2021 WSEC and have a few comments I would like to submit for consideration.

- C202, Definitions: I support the clarification that parking garages are not enclosed spaces and therefore not subject to “low energy” thermal envelope space provisions. This is a logical application of the intent of the code to regulate space types by conditioning type.
- C403.1.1, HVAC TSPR: recommend clarifying that only the stated building types that require DOAS, and that are ventilated, are applicable to this section.
- C403.1.4, Heat pump heating: I strongly support the proposal to require heat pump heating (except where exemptions apply) and restrict the use of fossil fuel and electric resistance heating in order to encourage electrification and decarbonization efforts.
- C404.2.1, Service water heating: I support the proposal to largely require heat pump based domestic hot water heating.
- C406: I recommend either clarifying or adding another column for lab buildings that might be Group B, since their strategies are going to be different from typical office buildings.
- C406: Overall, it seems there are far more available credits to residential occupancies than to commercial building types. Suggest adding more options for commercial (especially Group B) as the available strategies may be very limited in terms of viable collections of pathways.
- C407: I recommend adding a separate BPF for lab buildings that is higher than that of All Others.
- C411.2: I recommend clarifying/adding that C407 TBP projects can avoid this PV via a reduced BPF.
- C411: Buildings over 20 stories are exempt from solar readiness requirements. Should that exception be applied to renewable energy requirements as well?

Thank you for your efforts to improve energy efficiency and decarbonization in the built environment in Washington.

Regards,

Laurel Schandelmier

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